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10 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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12 UNITED STATES DISTRICT COURT

13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,

No. CR 23-461-MCS-1

15 Plaintiff,

JOINT STATUS REPORT AS TO
DEFENDANT OMAR NAVARRO

16 v.

Status Conference:
November 27, 2023, at 3:00 p.m.

17 OMAR NAVARRO,

Trial Date:
December 5, 2023, at 8:30 a.m.

18 Defendant.

22 Plaintiff United States of America, by and through its counsel
23 of record, the United States Attorney for the Central District of
24 California and Assistant United States Attorneys Frances S. Lewis
25 and Thomas F. Rybarczyk, and defendant OMAR NAVARRO ("defendant"),
26 by and through his counsel of record, David R. Evans, Esq., having
27 met and conferred by phone on October 25, 2023, hereby file this
28 Joint Report pursuant to the Court's Standing Order for Criminal

1 Cases.

2 **I. Status of Discovery**

3 On September 14, 2023, a grand jury indicted defendant for
4 conspiracy, wire fraud, falsification of records, and prohibited use
5 of campaign contributions. Defendant was arraigned on October 13,
6 2023. Pursuant to this Court's Criminal Standing Order, the
7 government produced and made available to defendant discovery within
8 its possession on October 18, 2023. To date, the government has
9 produced thousands of pages of discovery, including Federal Election
10 Commission reports, social media posts, recordings of several
11 interviews, and court-related documents for defendant OMAR NAVARRO,
12 among other things. The government intends to produce additional
13 material to defendant in the following month, including material
14 that contains sensitive personal identifying information that will
15 require a protective order for production. The parties hope to
16 reach agreement on the terms of a protective order soon and, in the
17 event that no agreement can be reached, the government will seek the
18 entry of a protective order from the Court. Additionally, the
19 government anticipates that it will receive and/or obtain additional
20 discoverable material related to this investigation, which it will
21 produce promptly to defendant.

22 Defendant has not yet produced any discovery to the government.

23 **II. Discovery Disputes**

24 The parties have not presently identified any contested matter
25 of discovery and inspection. Each party reserves the right to raise
26 issues as they arise.

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III. Anticipated Pretrial Motions

The parties have not presently identified any anticipated motions, but each party reserves the right to raise issues as they arise.

IV. Trial Date

The parties do not expect to proceed on the current December 5, 2023 trial date. The parties anticipate filing a joint stipulation to continue the trial date.

V. Anticipated Length of Trial

To the extent the case proceeds to trial against all defendants charged and does not resolve by plea agreement, the government expects its case-in-chief will last approximately six to seven days.

Dated: October 27, 2023

Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney

MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

/s/ Thomas F. Rybarczyk

FRANCES S. LEWIS

THOMAS F. RYBACZYK

Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

Dated: October 27, 2023

/s/ via authorization
DAVID R. EVANS, ESQ.

Attorney for Defendant
OMAR NAVARRO